Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Replacement of Part 90 by	)	
Part 88 to Revise the Private	)	PR Docket 92-235
Land Mobile Radio Services	)	
and Modify the Policies	)	
Governing Them	)	

SUPPLEMENT TO COMMENTS OF SECURICOR PMR SYSTEMS LTD.

Securicor PMR Systems Ltd. ("Securicor"), by its counsel, hereby supplements its Comments on the Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding.[1] In its Comments in this proceeding, Securicor reported that the Radiocommunications Agency ("RA") of the U.K.'s Department of Trade and Industry ("DTI") preliminarily had approved a specification for the use of 5 kHz channelization in the private mobile radio bands. A pre-publication copy of the MPT 1376 5 kHz specification was attached as Appendix 2 to Securicor's Comments. Securicor further indicated that it would report to the FCC when the RA finalized its adoption of the MPT 1376 specification. Comments of Securicor PMR Systems, Ltd., PR Docket 92-235 (May 28, 1993) at n. 2.[2]

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[1]Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them, 7 FCC Rcd. 8105 (1992).

[2]Securicor is concurrently submitting with this Supplement a "Motion For Leave To Supplement Comments."

This Supplement reports that on August 17, 1993 the RA issued a Press Notice and Policy Statement announcing the final adoption of the MPT 1376 specification. Copies of the RA's Press Notice and Policy Statement are attached as Appendix 1 to this Supplement.

In finalizing its adoption of the MPT 1376 specification, the RA noted that "the Agency is aware that equipment is currently available and sees it as important that users should be given an opportunity to make use of this new technology." Policy Statement at 1. The RA, accordingly, has stated that it will consider requests to employ 5 kHz channelization based upon the MPT 1376 specification (1) from existing users of (or applicants for) nationally exclusive channels; (2) in connection with its release of 2 MHz in Sub-band 3 of Band III (210 - 225 MHz) for private mobile radio use; (3) in connection with its release of 5 kHz channels in the U.K. VHF Low Band (66-88 MHz); and (4) ultimately, in connection with existing VHF PMR bands. The RA, moreover, has indicated the existence of interest in 5 kHz technology within Europe and stated its intent to open discussions with appropriate regulatory authorities in other European nations looking toward implementation of MPT 1376 as a common standard. Policy Statement at 2.

In its Comments and Reply Comments in this Docket, Securicor detailed the capabilities of its 5 kHz linear modulation ("LM") PMR system, which meets the MPT 1376 U.K.

specification. Securicor thus expressed its confidence that 5 kHz Very Narrowband Radio ("VNBR") technology is a reality today, and commended to the FCC for its consideration the MPT 1376 specification. The recent action of the RA, and the interest of other European nations in the MPT 1376 specification, clearly support these conclusions.

In addition, in its Comments, Securicor urged the Commission to consider the timely introduction of 5 kHz VNBR in the U.S. as instrumental to international equipment compatibility and, in turn, to the exportability of U.S. and U.K. manufactured equipment alike. The emerging interest in European nations in the MPT 1376 specification, and the RA's intention to promote acceptance of that specification throughout Europe, further underscores the importance of compatibility between U.S. and U.K. private mobile radio equipment.

Respectfully submitted,
SECURICOR PMR SYSTEMS LTD.

By: _____

Douglas L. Povich
KELLY, HUNTER, MOW & POVICH, P.C.
1133 Connecticut Ave., N.W.
Washington, D.C. 20036
(202) 466-2425

ITS COUNSEL

September 8, 1993

RADIOCOMMUNICATIONS AGENCY

APPENDIX 1

Waterloo Bridge House, Waterloo Road, London SE1 8UA. Switchboard 071-215 5000, Telex 261969 DTIWBH G

PRESS NOTICE

P/93/474

17 August 1993

OPENING 5KHz CHANNEL WILL MEET INCREASING PRIVATE MOBILE RADIO DEMAND

The Radiocommunications Agency is to make the narrow band 5KHz channel available to private mobile radio (PMR) users to meet increasing demand.

PMR channels are currently almost entirely of 12.5KHz bandwidth, with heavy use in London and other major conurbations.

The Agency has actively encouraged development of more spectrally efficient new technology. One approach is to enable customers to operate in channels with a 5KHz bandwith. Other technologies being developed are not yet sufficiently mature to be introduced.

The Agency considers the 5KHz option an important development. A co-existence specification, MPT 1376, giving effect to the option, has been cleared with the European Commission.

Interest is being shown in the new technology in Europe, and the Agency will be opening discussions with the regulatory authorities in other European countries to establish the case for this option throughout Europe, based on the MPT 1376 specificaiton.

The Agency is prepared to consider requests to make use of the 5KHz channel option, using equipment that meets the MPT 1376 specification, from existing users of (or applicants for) nationally exclusive channels on a basis to be agreed with the individual user.

The Agency expects shortly to release for PMR use spectrum of initially up to 2x1MHz of Sub-band 3 of Band III (200 channels) which has until now been used for other purposes. The Agency also expects to make available other 5kHz channels in part of VHF low band.

The Agency is also looking at the scope for introducing 5KHz channels more generally into the PMR bands in the light of market developments.

NOTES TO EDITORS

1. Narrowband technology is frequently referred to as 'linear modulation' and has been pioneered in the UK by Bristol and Bath Universities.

2. The UK standard MPT 1376 has been developed by the Agency in collaboration with industry.

3. A copy of a full policy statement issued today by the Agency and copies of the MPT 1376 standard can be obtained, free of charge from: The Library, Radiocommunications Agency, Waterloo Bridge Road, London SE1 8UA.

ENDS

Press Enquiries: 071 215 5962/1
(Out of Hours: 071 215 4657/8)
Public Enquiries: 071 215 2150

END

PRIVATE MOBILE RADIO: 5kHZ CHANNELS

Policy Statement by the Radiocommunications Agency

Introduction

There is extensive use of private mobile radio (PMR) within the UK with allocations in a number of parts of the spectrum. PMR channels are now, almost without exception, of 12.5kHz bandwidth. There is heavy use of PMR in London and other major conurbations and we expect demand for PMR to continue to increase in the foreseeable future.

2. For some time now the Agency has been actively encouraging work at developing new technology which would be more spectrally efficient. This approach is also being followed in other Countries. In the UK there have been strong expressions of interest and a good deal of work to develop the technology which would allow PMR users to operate within channels with a 5kHz bandwidth. A co-existence specification (MPT 1376) has been elaborated to give effect to the 5kHz channel option. This has now been cleared with the European Commission.

New Technology

3. The Agency fully recognises that narrow band FDMA 5kHz channelling is one of a number of possible ways of achieving the benefits of greater spectrum efficiency. TETRA (Trans European Trunked Radio) is another approach - it uses a TDMA structure to offer a trunking alternative - and is expected to provide spectral efficiency gains of a similar order. Digital short range radio (DSRR) is a further example. The Agency fully supports these proposals for introducing new technologies which are expected to lead to improved spectrum efficiency and expects to see their introduction in the UK in due course.

4. Currently, however, neither TETRA nor DSRR are sufficiently mature and no equipment is available. In the case of the 5kHz channel option the Agency is aware that equipment is currently available and sees it as important that users should be given an opportunity to make use of this new technology.

Spectrum Considerations

5. The Agency is prepared to consider requests to make use of the 5KHz channel option using equipment that meets the MPT 1376 specification on the following basis:

a. from existing users of (or applicants for) nationally exclusive channels on a basis to be agreed with the individual user;

b. the Agency expects shortly to release 2 x 1 MHz for PMR use in Sub-band 3 of Band III which hitherto has been used for other purposes and the Agency will make this spectrum available in 5KHz channels (it should be noted that the 8MHz transmit/receive spacing may need to be adjusted in the light of developments within Europe on advanced broadcasting techniques);

c. the Agency also expects to release shortly a small number of 5kHz channels for shared use in VHF Low Band; and

d. in addition, the Agency is looking actively at the scope for introducing 5kHz channels into existing PMR VHF bands. The Agency recognises that by introducing 5kHz channels into existing PMR bands, the 12.5kHz channel plan will require active and sensitive management and, in the light of market developments, the Agency will be putting forward separate proposals in due course as to how this significant transition might be achieved.

Further Developments

6. The Agency believes that this progressive introduction of 5kHz channels will enable users to take advantage of this new technology and will provide a sound basis for manufacturers to supply into the market. The Agency recognises that it may be necessary to amend and update the MPT 1376 specification and it will consider any proposals for such modifications at any time and in the light of experience.

7. The Agency considers that the benefits of the 5kHz channel option for PMR users is an important development providing significant gains in terms of spectrum efficiency. The Agency is already aware of interest being shown in this new technology within Europe and will be opening discussions with the regulatory authorities of other European countries to establish the case for the 5kHz channel option for PMR uses throughout Europe based on the MPT 1376 specification.

Mobile Services Branch
Radiocommunications Agency
August 1993

CERTIFICATE OF SERVICE

I, Douglas L. Povich, hereby certify that on this 8th day of September, 1993 copies of the forgoing Supplement to Comments of Securicor PMR Systems, Ltd. were sent by first class mail, postage prepaid, to the following parties:

Louis Fiore, Chairman
Alarm Industry Communications Committee
7101 Wisconsin Avenue
Suite 1390
Bethesda, Maryland 20814-4805

Eric Schimmel, Vice President
Telecommunications Industry Association
2001 Pennsylvania Avenue
Suite 800
Washington, D.C. 20006

Jeffrey L. Sheldon
Utilities Telecommunications Council
1140 Connecticut Avenue, N.W.
Suite 1140
Washington, D.C. 20036

Phillip L. Spector
Nippon Telegraph and Telephone Corporation
1615 L Street, N.W.
Suite 1300
Washington, D.C. 20036

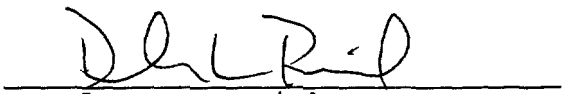
Norman R. Shivley
Project Manager
SEA Inc.
7030 20th Street, S.W.
Mountlake Terrace, WA 98043

Spencer L. Bahner
Radio Communications Specialist
Airborne Express
3101 Western Avenue
Post Office Box 662
Seattle, Washington 98111

Carole C. Harris
American Meter Company
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001

Donald N. Nelson
President
Metro-North Commuter Railroad
347 Madison Avenue
New York, New York 10017

Jeffrey D. Pegram
Communications Engineer
Commonwealth of Virginia
Department of Health
Office of Emergency Services
1538 East Parham Road
Richmond, Virginia 23228



Douglas L. Povich

FEDERAL COMMUNICATIONS COMMISSION

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5. Law Firm Name (25) KELLY,HUNTER,MOW & POVICH

6. Attorney/Author Name (last, first, mi) (25) Douglas L. Povich

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